



GOVERNOR TERRY E. BRANSTAD  
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June 28, 2011

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: TRS Consumer Complaint Log Summaries for June 1, 2010 through May 31, 2011  
CG DOCKET NO. 03-123

Dear Ms. Dortch,

The State of Iowa, Iowa Utilities Board respectfully submits the enclosed complaint log in connection with the provisioning of Telecommunications Relay Service pursuant to Section 64.604(c)(ii) of the FCC's rules. Hamilton Relay, with corporate offices located at 1001 12<sup>th</sup> Street, Aurora, NE 68818, is under contract with the Iowa Utilities Board to provide Telecommunications Relay Service.

Hamilton tracks all complaints and all other customer service activity for the State of Iowa. Iowa's complaint summary is associated with the following database categories:

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation

1375 E. COURT AVE., RM 69/ DES MOINES, IOWA 50319-0069 / 515.725.7300 / FAX 515.725.7399

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- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Improper Handling of Three Way Calling
- Caller ID Not Working Properly
- Improper Use of Customer Data
- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breach
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems
- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access
- CapTel Complaints

Hamilton processes any complaint, which originates via e-mail, fax, telephone, regular mail, outreach events, at the workstation, etc. Those complaints and resolutions are reflected in this report. Hamilton normally provides a resolution to all complaints within 72 hours. The complaints enclosed are resolved with the exception of one equal access complaint in which the carrier involved is still working to become a carrier through relay.

Relay Iowa has received a total of 52 complaints in violation of FCC mandatory minimum standards for the time period June 1, 2010 through May 31, 2011. All but 12 of the 52 complaints were resolved within 24 hours.

In the Miscellaneous External and Fraudulent/Harassment Call categories, you will find several complaints that we believe to be associated with fraudulent activity over Internet Relay. Hamilton continues to implement protocols specifically designed to prevent calls originating from an international IP address from accessing the relay.

In regards to Captioned Telephone Service, there were four different occasions in Iowa during the reporting year where the answer performance fell below required standards. On December 12, 2010, a blizzard in Wisconsin at the call centers caused the average answer time to be 8.8 seconds in Iowa, with only 57 percent of the calls answered within

ten seconds. A blizzard occurred again in Wisconsin on February 2, 2011, causing the average answer time to be 42.4 seconds and a mere 6 percent of the calls answered within ten seconds. Since these were weather-related issues, Iowa did not assess penalties. The other instances where answer performances fell below minimum standards in Iowa occurred on December 20 and 26, 2011. The reductions in performance standards were due to a problem with ACD facilities on both primary and backup systems, and high call volumes, respectively. These two occasions resulted in Iowa penalties to Hamilton.

These situations clearly demonstrate that despite the fact that there are two CapTel call centers, both are located in Wisconsin and are not geographically diverse enough to mitigate problems caused by weather conditions. In addition, the non-weather related issues experienced also validate the need for better redundancy between CapTel facilities. Before the FCC decides to mandate CTRS, we believe that these lack of redundancy issues need to be resolved.

Please feel free to contact myself at 515-725-7340 (V) or Dixie Ziegler with Hamilton Relay at 800-618-4781 (V/TTY) with any questions regarding the above.

Sincerely,

/s/  
Joni Nicoll  
Project Manager, Relay Iowa